

I am alarmed that the FCC has granted a waiver to LightSquared to use spectrum near GPS frequencies for terrestrial signals without fully considering the possible impacts. The long-standing management of those frequencies could never have led the GPS manufacturers and users to think that such strong signals would be allowed so close to the GPS frequencies. To put this on the backs of the GPS manufacturers and users is absurd.

Testing has definitively shown that LightSquared using the band immediately adjacent to GPS is out of the question without herculean, expensive efforts with modifying GPS equipment, and it is not certain that there is an adequate technical fix. LightSquared's recent proposal to use the lower end of their spectrum and look into filters, etc., has not been tested and is by no means a sure bet.

Using the band at the lower end will have impact on precision navigation. The FAA is trying desperately to modernize air traffic control (NextGen), and the entire effort is dependent on precision GPS navigation. Also, with precision GPS, access to precision approaches to airports in smaller communities is enabled without the huge expense of ground-based instrument landing systems.

I work for a company that is assisting the FAA in planning, testing, and executing NextGen which will provide benefits in reducing flight times thus enhancing efficiency and lowering costs as well as reducing emissions. NextGen is challenging enough without negating the very lynchpin upon which it is based.

I realize that spectrum allocation is very challenging, but I find it very difficult to believe that a more appropriate spectrum assignment couldn't be made for LightSquared's high-strength signals without threatening precision GPS.